

EXHIBIT 17

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,)
 Plaintiffs,)
 vs.) No. 20-cv-00983-TSZ
CITY OF SEATTLE,)
 Defendant.)

ZOOM VIDEO CONFERENCE DEPOSITION UPON ORAL EXAMINATION
OF
LARISA DEYOUNG

ATTENDANCE OF ALL PARTICIPANTS VIA
ZOOM VIDEO CONFERENCE

1:01 p.m.
September 19, 2022

REPORTED BY: Lauren G. Harty, RPR, CCR #2674

1 A. Yes.

2 Q. And so what did -- what -- what's Carmen's
3 last name, by the way?

4 A. O'Toole.

5 Q. And does -- is Carmen a male or female?

6 A. Female.

7 Q. And does she still live there, as far as you
8 know?

9 A. No.

10 Q. And what did Carmen tell you that -- about
11 the neighbors using Signal?

12 A. It was a way for us to communicate with one
13 another privately.

14 Q. Do you know what she meant by privately?

15 A. I think so that we could have a group of
16 people that we knew and trust, that we knew face to
17 face.

18 Q. And did you ask her who was involved in the
19 group at that point?

20 A. I don't remember what I asked her at that
21 point.

22 Q. Did you -- so tell me -- okay. So -- and
23 she tells you about it and then you signed up for
24 Signal; is that right?

25 A. Uh-huh. Yes.

1 it -- would everybody get a message saying, "LaRisa
2 has joined the group," or, "Tyler has joined the
3 group"?

4 A. You only get to know the identity of the
5 person in the group if you also have their phone
6 number in your phone.

7 Q. Okay.

8 And did you have the phone number of
9 everyone in the business group in your phone by the --

10 A. I'm going --

11 Q. -- name of --

12 A. -- to -- I'm going to step back and correct.
13 Also if you communicate with someone, like if they
14 identify themselves in the group, like if they -- I
15 can't remember. If they identify themselves, then I
16 think their name shows up. And so Annika Sparkles,
17 that's what she named herself, and so that's how I
18 know her.

19 Q. Okay.

20 A. So not necessarily did people use their real
21 name.

22 Q. Did -- one of the other things that I
23 understand about Signal is that it allows you to set
24 it so that your messages delete after a period of
25 time? Is that something that you saw?

1 A. That's called Disappearing Messages.
2 Anybody in the group can set the -- the -- set it so
3 that it goes to Disappearing Messages. And it
4 happened periodically but never for very long.

5 Somebody would set it to Disappearing Messages. I --
6 I set it back to not disappear at one point because if
7 something happened and we'd want to be able to refer
8 back to a news article or something that we shared,
9 then I -- that -- that's why. And anybody in the
10 group can do it.

11 Q. And there's no -- so -- so anybody can --
12 can decide to set their messages to be Disappearing
13 Messages.

14 A. Everybody's messages, the whole group.

15 Q. Okay.

16 And do you know whether in -- for any of the
17 Signal groups in which you participated Disappearing
18 Messages were ever put on?

19 A. They were put on and they were taken off,
20 put on and taken off. It never lasted for very long;
21 For, you know, 20 minutes or something like that.

22 Q. So just --

23 A. That's --

24 Q. -- when --

25 A. -- all. Yeah. And then it doesn't like

1 A. Yes.

2 Q. Okay.

3 And what -- what was -- what is Stephanie's
4 last name, if you know?

5 A. M-O-O-R-E-S.

6 Q. Stephanie Moores?

7 A. Yeah.

8 Q. And is -- this Signal spreadsheet appears to
9 be a spreadsheet that came from Stephanie Moores'
10 phone. Are you aware of that?

11 A. I am.

12 Q. Okay.

13 Why did Stephanie Moores' Signal data get
14 provided?

15 A. I don't know.

16 Q. Did -- do you have Signal data from -- going
17 back to June of 2020?

18 A. Well, I did until about a week ago when I
19 got a new phone and then it wasn't on there, yeah. My
20 phone -- my phone broke, and so they put all -- they
21 transferred everything over to my new one, but it
22 wasn't on there, but it was up until then.

23 Q. And do you still have that old phone?

24 A. No. Apple has it.

25 Q. Okay.

1 So you had all of the Signal data from June
2 of 2020 up until a week ago; is that right?

3 A. Yeah. I don't know. Maybe it was two
4 weeks. And then I -- yeah. Very recently.

5 Q. Do you know why -- well, was there a reason
6 why the Signal data from your phone wasn't provided to
7 us in the --

8 A. I --

9 Q. -- case?

10 A. -- don't know. I gave them -- I gave them
11 my phone and they took everything at that time, as far
12 as I know.

13 Q. Were you part of the group -- did you -- did
14 you ever talk to Stephanie Moores about needing her
15 Signal data for the case?

16 A. No.

17 Q. And did your Signal data --

18 MR. CRAMER: Strike that.

19 Q. (By Mr. Cramer) Was your Signal data
20 complete up until you turned it into the Apple Store a
21 couple of weeks ago?

22 A. Complete how? Like a form being filled out?
23 I don't understand your question.

24 Q. Sure.

25 Had you deleted any of your Signal data from

1 June of 2020 when --

2 A. No.

3 Q. -- you -- you got a new phone?

4 A. No.

5 Q. And when did you get the new phone?

6 A. A week or two ago I repeat.

7 Q. Did you get the new phone in calendar month
8 September?

9 A. I don't know. I -- it's been two, three
10 weeks. I don't know. Do you want me to like go find
11 out?

12 Q. That would be great.

13 THE WITNESS: Can we look at our credit card
14 statements and find out when we got the phones back,
15 please?

16 Q. (By Mr. Cramer) And does Stephanie Moores --
17 she worked at the Hugo House; is that right?

18 A. She does not work at the Hugo House anymore.

19 Q. Okay.

20 But she did work at the Hugo House in June
21 of 2020?

22 A. Yes.

23 Q. Okay.

24 Do you know when she stopped working at the
25 Hugo House?

1 MR. WEAVER: -- just asking if she sees --

2 MR. CRAMER: Yeah.

3 MR. WEAVER: -- the line?

4 Q. (By Mr. Cramer) If there are direct messages
5 between you and Ms. Moores.

6 A. Looks like it.

7 Q. Did you direct message with people other
8 than Ms. Moores --

9 A. No.

10 Q. -- while --

11 So you -- you never sent any direct messages
12 to anyone else besides Ms. Moores using --

13 A. I --

14 Q. -- Signal?

15 A. -- mean, it's possible. I do direct message
16 with people and I did at that time, but I don't
17 remember doing it. And mostly it was with Stephanie
18 because she was the person I was closest with.

19 Q. Okay.

20 Did you direct message with Mr. Biller at
21 all during this time period?

22 A. I don't think so. He lives across the
23 street, so we'd just stand outside and talk.

24 Q. Okay.

25 So you don't -- so your testimony is that

1 you didn't ever direct message with Mr. Biller

2 during --

3 A. Not --

4 Q. -- the --

5 A. -- that I remember.

6 Q. -- during the summer or fall of --

7 A. Not that I remember.

8 Q. But it's possible that you did?

9 A. I mean, yeah, sure.

10 Q. And if you would have --

11 MR. CRAMER: Strike that.

12 Q. (By Mr. Cramer) Your communications with --

13 in groups with Mr. Biller related to the protest

14 activity that was going on in the neighborhood, right?

15 A. What?

16 Q. Your communications on Signal in --

17 A. Yeah.

18 Q. -- these groups --

19 A. That was -- that was protest activity. You

20 can see it.

21 Q. Okay.

22 And is that what you were communicating with

23 Mr. Biller about as well?

24 A. If I communicated with him, that's all it

25 would have been; what was happening outside, you know,

1 or I need a ride to the hospital or I need a ride home
2 from the hospital. Everyday normal communications
3 that people have with one another. And I doubt that
4 it would be on Signal. It's possible, but we'd
5 communicate with each other by text message primarily.

6 Q. Okay.

7 So you -- you were text messaging with
8 Mr. Biller in --

9 A. All --

10 Q. -- 20 --

11 A. -- the time. He's my friend. He lived
12 across the street from me. We'd talk, yeah.

13 Q. And were you communicating by text with
14 Mr. Biller about what was going on in CHOP?

15 A. Yeah. I talked to everybody in CHOP about
16 what was going on in CHOP. Nothing else to talk
17 about.

18 Q. Scroll down to row 2713, if you would.

19 A. Okay.

20 Q. Okay?

21 So this is a new group --

22 A. Yeah.

23 Q. -- and this group is called OUR STREETS. Do
24 you see --

25 A. Yes.

C E R T I F I C A T E

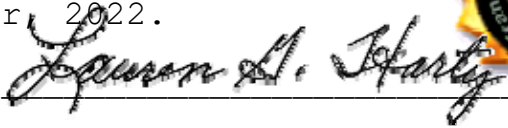
STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

I, the undersigned Washington Certified Court Reporter, hereby certify that the foregoing deposition upon oral examination of LARISA DEYOUNG was taken before me on September 19, 2022, and transcribed under my direction;

That the witness was duly sworn by me pursuant to RCW 5.28.010 to testify truthfully; that the transcript of the deposition is a full, true, and correct transcript to the best of my ability; that I am neither attorney for nor a relative or employee of any of the parties to the action or any attorney or counsel employed by the parties hereto, nor am I financially interested in its outcome;

I further certify that in accordance with CR 30(e), the witness was given the opportunity to examine, read, and sign the deposition within 30 days upon its completion and submission, unless waiver of signature was indicated in the record.

IN WITNESS WHEREOF, I have hereunto set my hand
this 22nd day of September, 2022.


LAUREN G. HARTY, CCR #2674

